

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE ELETROBRAS SECURITIES  
LITIGATION

Case No.: 15-cv-5754-JGK

JURY TRIAL DEMANDED

**LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION  
OF SETTLEMENT PROCEEDS**

TO: ALL PARTIES AND COUNSEL OF RECORD

PLEASE TAKE NOTICE that on **December 5, 2018, at 4:30 p.m.**, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or as soon thereafter as may be heard before the Honorable John Koeltl, United States District Judge, Lead Plaintiffs City of Providence, Rhode Island and Dominique Lavoie (collectively, "Lead Plaintiffs"), will and hereby move for an order granting final approval to the settlement of this class action and dismissing the litigation with prejudice, approving the Plan of Allocation of settlement proceeds, and certifying the class for settlement purposes. Lead Plaintiffs' motion is based upon the Lead Plaintiffs' Memorandum in Support of Their Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation of Settlement Proceeds, the declarations and exhibits submitted in support thereof, all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing on Plaintiff's motion.

Dated: October 31, 2018

Respectfully Submitted,

**KAHN SWICK & FOTI, LLP**

By: /s/ Ramzi Abadou

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*Co-Lead Counsel for the Class*

### **CERTIFICATE OF SERVICE**

I, Ramzi Abadou, hereby certify that, on Wednesday, October 31, 2018, I caused the foregoing to be served on all counsel of record by filing the same with the Court using the CM/ECF system which will send electronic notices of the filing to all counsel of record.

/s/ Ramzi Abadou

Ramzi Abadou